

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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RINA OH n/k/a RINA OH AMEN,

Plaintiff,

CASE NO: 21-cv-8839

v.

PROPOSED DISCOVERY ORDER

VIRGINIA L. GIUFFRE,

Defendant.
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It is hereby ORDERED that:

1. The parties shall serve responses to demands for interrogatories and document requests no later than February 13, 2023.
2. Plaintiff's deposition shall be held on or before March 30, 2023.
3. Defendant's deposition shall be held on or before April 14, 2023.
4. Non-party depositions shall be held on or before April 28, 2023.
5. All fact discovery shall be completed no later than May 19, 2023.
6. The parties shall file a joint status report with the Court on May 19, 2023.
7. Expert discovery shall be conducted on the following schedule:
 - a. Any Plaintiff's expert reports shall be served no later than June 2, 2023.
 - b. Defendants' rebuttal reports shall be served no later than July 5, 2023.
 - c. Expert discovery shall be completed no later than August 5, 2023.
8. A pre-motion letter shall be submitted to the Court pursuant to Judge Naomi Reice Buchwald's individual Court rules by August 21, 2023.
9. Any dispositive motions to be filed by September 18, 2023.

10. The parties shall submit joint status reports to the Court, regarding the case and Readiness of the case for trial no later than September 29, 2023.

DATED: New York, NY
January 3, 2023

_____/s/_____
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_____/s/_____
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Counsel for Plaintiff

SO ORDERED

Hon. Naomi Reice Buchwald
United States District Judge